

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	CRIMINAL NO. 4:14-CR-074-Y
	§	
JONATHAN DANIEL KUTEJ (1)	§	

MOTION TO APPOINT PRIVATE INVESTIGATOR

TO THE HONORABLE JUDGE TERRY R. MEANS:

NOW COMES the Defendant, JONATHAN DANIEL KUTEJ (1), who by and through the undersigned counsel, moves this Honorable Court to appoint an Investigator in this case.

1. The Defendant would show that, due to the nature of the case and the number of witnesses that may be testifying, it is necessary that an investigator be appointed so the Defendant may properly prepare for trial.
2. As such, the investigator should interview all witnesses, compile records and documents that may be necessary, locate missing witnesses, and seek evidence wherever it may be located, either tangible or testamentary, except work product of the United States Attorney's Office or otherwise privileged information.
3. It is requested that this Motion be granted without hearing, or in the alternative, such a hearing is hereby specifically requested.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this Motion be in all things granted.

Respectfully submitted,

s/J. Warren St. John
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ATTORNEY FOR DEFENDANT (1)

CERTIFICATE OF CONFERENCE

I hereby certify that on September 5, 2014, my office corresponded with Ms. Aisha Saleem in order to determine whether she would or would not oppose the foregoing Motion to Appoint Private Investigator. Ms. Saleem is unopposed.

s/J. Warren St. John
J. WARREN ST. JOHN

Attorney for Defendant (1)

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2014, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Ms. Aisha Saleem.

s/J. Warren St. John
J. WARREN ST. JOHN

Attorney for Defendant (1)